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January 13, 2011

RECEIVED

JAN 14 2011

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

Via ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 E. State Street, Room 6 East
Trenton, New Jersey 08608

Re: *American General Life Ins. Co. v. Ellman Savings Irrevocable Trust, et al.*

Civil Action No. 3:08-cv-05364-MLC-TJB

Our File No.: 07478.00537

Levitt, Esq. v. American General Life Ins. Co.; Civil Action No. 10-1458 (GEB)

Dear Judge Bongiovanni:

As per Your Honor's request, please accept this joint letter detailing the parties' proposed discovery schedule, as follows:

- Close of fact discovery: 8/1/11
- Due date for affirmative expert reports: 8/15/11
- Due date for responsive expert reports: 9/15/11
- Any discovery or case management issues will be brought to the attention of the Court no later than: 9/15/11.
- *A telephone conference is set for May 23, 2011 at 10:30 A.M. American General Life Ins. Co. Shall initiate the call.*

The parties propose that all other provisions of the Scheduling Order entered on January 26, 2010 (including the amendments made to said Scheduling Order by Your Honor's ruling of May 24, 2010) remain unchanged.

We thank the Court for its attention to this matter. We are available to discuss this matter at the Your Honor's convenience.

So Ordered this 14th day
of January, 2011
Thomas J. Bongiovanni

To:
January 13, 2011
Page 2

Respectfully,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Karen D. Peck

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KDP:kdp

Cc: David BenHaim, Esq. (via ECF)
Daniel Louis Grossman, Esq. (via ECF)